



RELIABILITY BUILT INSM

October 1, 2004

Docket Office
California Energy Commission
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

Subject: Docket No. 04-AAER-1

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DATE OCT 01 2004
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To Whom It May Concern:

As the developer of both the original pre-rinse unit spray valve and the low-flow spray valve, T&S Brass and Bronze Works, Inc. is excited about the recent activities taken by the CEC to regulate, and in some applications, mandate the use of energy saving low-flow pre-rinse unit spray valves.

In support of this effort, and in response to the 45-Day Language put out for review on September 10, 2004, T&S respectfully submits the following comments:

- Section 1605.1(h)(4): "...Commercial Pre-rinse Spray Valves" should be changed to, "...Commercial Pre-rinse Unit Spray Valves that are installed and used in conjunction with commercial dishwashing and ware washing equipment."
Rationale: "Commercial Pre-rinse Spray Valves" is too general a description. Many products with this name are used as pot and kettle fillers, kitchen wash down stations, etc., where a high flow rate is important. For example, when used as a pot/kettle filler, the end user must hold the valve open until the large pot/kettle is filled. At 1.6 (or less) flow rate, the time to fill the container is increased by a factor of about 3 with no resulting water or energy savings.
- Section 1605.3(h)(3): "...Commercial Pre-rinse Spray Valves" should be changed to, "...Commercial Pre-rinse Unit Spray Valves that are installed and used in conjunction with commercial dishwashing and ware washing equipment."
Rationale: See above.
- Section 1607(d)(8): Suggest that the marking requirement be applicable to low-flow pre-rinse unit spray valves only. Further suggest that marking of product packaging and sales/specification drawings is sufficient.
Rationale: Requiring a marking of this type on spray valves that are not part of the water & energy savings programs is cost prohibitive and a major hardship for manufacturers. Marking only the low-flow units suffices to identify what products have been evaluated for the purposes of the CEC ruling. Marking packaging versus the individual products will result in a significantly lower cost to manufacturers.



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The undersigned will attend the October 13 hearing at CEC. If you should have any questions about the preceding comments/suggestions and wish to contact T&S prior to the hearing, contact information is included below.

Thank you for your consideration of these comments.

Sincerely,



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